

FILED IN OPEN COURT
ON 4-11-2023
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION

No. 4:23-CR-23

UNITED STATES OF AMERICA

v.

ANDRE DAVIS
a/k/a "Dre"

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Beginning at a date unknown, but no later than in and around 2021, and continuing up to and including on or about January 3, 2022, in the Eastern District of North Carolina, and elsewhere, defendant herein, ANDRE DAVIS, also known as "Dre," did knowingly and intentionally combine, conspire, confederate and agree with other persons, known and unknown to the Grand Jury, to distribute and possess with the intent to distribute forty (40) grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about January 3, 2022, in the Eastern District of North Carolina, ANDRE DAVIS, also known as “Dre,” defendant herein, did knowingly and intentionally possess with the intent to distribute forty (40) grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any felony violation of the Controlled Substances Act charged herein, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offense.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the

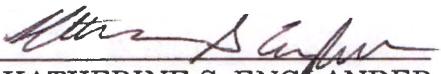
intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

DATE: 4-11-2023

MICHAEL F. EASLEY, Jr.
United States Attorney


BY: KATHERINE S. ENGLANDER

Assistant United States Attorney